

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROBERT SCHMIDT, individually and on
behalf of all others similarly situated,

Plaintiff,

V.

JAGUAR LAND ROVER AUTOMOTIVE
PLC and JAGUAR LAND ROVER
NORTH AMERICA, LLC,

Defendants.

Case No. 2:18-cv-08528-CCC-
JBC

**NOTICE OF MOTION TO
DISMISS PLAINTIFF’S
CLASS ACTION
COMPLAINT**

**ORAL ARGUMENT
REQUESTED**

TO: Gary S. Graifman, Esq.
Jay I. Brody , Esq.
KANTROWITZ, GOLDHAMER & GRAIFMAN P.C.
747 Chestnut Ridge Road
Chestnut Ridge, NY 10977

Thomas P. Sobran, Esq.
THOMAS P SOBRAN PC
7 Evergreen Lane
Hingham, MA 02043

COUNSEL:

PLEASE TAKE NOTICE that, on September 4, 2018, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for Defendant

Jaguar Land Rover North America, LLC (“JLRNA”), will move before the Honorable Claire C. Cecchi, U.S.D.J., United States District Court for the District of New Jersey, at the Martin Luther King, Jr. Federal Building & United States Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order dismissing the Class Action Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6); and

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, JLRNA shall rely upon the Memorandum of Law and an exhibit submitted herewith; and

PLEASE TAKE FURTHER NOTICE that JLRNA hereby requests oral argument; and

PLEASE TAKE FURTHER NOTICE that, at that time and place aforesaid, JLRNA will request that the proposed form of Order submitted herewith be entered by the Court.

By: /s/ Brian D. Sullivan
Brian D. Sullivan, Esq.
FOX ROTHSCHILD LLP
49 Market Street
Morristown NJ 07960
Telephone: (973) 994-7525
Facsimile: (973) 992-9125

Michael L. Kidney (*pro hac vice* pending)
James W. Clayton (*pro hac vice* pending)
HOGAN LOVELLS US LLP
555 Thirteenth Street, N.W.
Washington, D.C. 20004-1109
Telephone: (202) 637-5883

Facsimile: (202) 637-5910

*Attorneys for Defendant Jaguar Land Rover
North America, LLC*

Dated: July 31, 2018